

EXHIBIT 2

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS.

SUPERIOR COURT DEPARTMENT
C.A. 05-10873 RWZ

Grant Boyd, Plaintiff

v.

Mike Austin, Richard Cardinal, Cathy
Lynch, Thomas Hannon, Michael Neri,
Brian Gillen, Joseph McDonald, Edward
O'Donnell, Rhiane Kohl, Kathleen
Dennehy, and Anthony Dichio,
 Defendants

AFFIDAVIT

I, Cathy Lynch, Paralegal in Inmate Legal Services, do hereby depose and state the following:

1. Inmates at Plymouth County Correctional Facility are entitled to access our services in Inmate Legal Services via Inmate Request Slips, in which they list case cites and request printed cases, or they may request other informational materials for their personal use or knowledge;
2. Inmate Legal Services provides copies of legal materials as requested by the inmates on said Inmate Request Slips;
3. Inmate Legal Services maintains a Daily Log that is kept in order to keep track of the services provided to the approximately 1,600 inmates that we service on a daily basis;
4. Inmate Legal Services provided services to Inmate Grant Boyd from the time period of January 3, 2005 (date he was booked in to the facility) through March 22, 2005 (date he was transferred out of the facility). Below is a chronological list of services provided to Inmate Grant Boyd. For clarification, "case law" means we responded to the inmate's request to print out a specific case cite; the term "copies" means that the inmate has been provided with Xerox copies of the materials requested. Inmates

may also request specific statutes (both federal and state) or Policies and Procedures for this institution, or supplies such as envelopes or certified mail receipts:

- January 14, 2005 case law
- January 18, 2005 case law (2 request slips)
- January 20, 2005 case law
- January 25, 2005 case law
- January 27, 2005 case law
- January 28, 2005 case law
- February 1, 2005 case law (3 request slips)
- February 2, 2005 case law
- February 3, 2005 case law
- February 7, 2005 copies and case law
- February 9, 2005 case law
- February 10, 2005 case law
- February 11, 2005 case law (2 request slips)
- February 15, 2005 copies and case law
- February 16, 2005 copies
- February 17, 2005 case law
- February 23, 2005 case law (2 request slips)
- February 24, 2005 case law
- February 25, 2005 case law
- February 28, 2005 case law

- March 2, 2005 case law (3 request slips)
- March 3, 2005 case law
- March 4, 2005 various Policies & Procedures;
Revocation of Power of Attorney Form
- March 7, 2005 case law
- March 9, 2005 Federal Civil Rules; Federal Local Rules;
Various USCA's
- March 10, 2005 MGL c. 127 Index
- March 11, 2005 Sent 4 certified mail forms and 4 copies of
Legal letter
- March 14, 2005 copies
- March 18, 2005 copies
- March 21, 2005 case law

Signed under the pains and penalties of perjury, this 5 day of ^{July}~~June~~, 2005.


Cathy Lynch – Paralegal
Inmate Legal Services